

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

FILED

JAN 12 2006

U.S. COURT OF
FEDERAL CLAIMS

RUSSIAN RECOVERY FUND LIMITED,
BRACEBRIDGE CAPITAL, L.L.C., Tax
Matters Partner,

Complainant,

vs.

THE UNITED STATES,

Respondent.

Case No.

06-35 T

NOTICE OF DIRECTLY RELATED CASES

Pursuant to Rule 40.2(a) of the Rules of the United State Court of Federal Claims, Bracbridge Capital, L.L.C., files this Notice of Directly Related Cases, and in support thereof states the following:

1. On January 10, 2006, Russian Recovery Advisors, L.L.C. ("Russian Advisors") filed a Complaint for Readjustment of Partnership Items as the Tax Matters Partner ("TMP") for Russian Recovery Fund Limited ("RRF") for the tax year ended December 31, 2000. The name of this case is Russian Recovery Fund Limited, Russian Recovery Advisors, L.L.C., Tax Matters Partner vs. The United States, and its docket number is _____.

2. Also on January 10, 2006, Russian Advisors filed a second Complaint for Readjustment of Partnership Items as the TMP for RRF for the tax year ended December 31, 2001. The name of this case is Russian Recovery Fund Limited, Russian Recovery Advisors, L.L.C., Tax Matters Partner vs. The United States, and its docket number is _____.

Both cases involve the same parties and are based on the same or

similar claims, insofar as both cases relate to the proper tax treatment of partnership items in RRF that were allocated to the same partner, FFIP, L.P.

3. On January 12, 2006, Bracebridge Capital, L.L.C. ("Bracebridge") filed a protective Complaint for Readjustment of Partnership Items as the subsequently designated TMP for RRF for the tax year ended December 31, 2000. This action is directly related to the first action, and indirectly related to the second action.

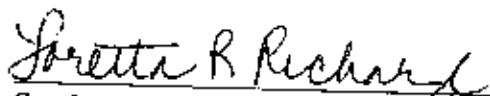
4. This action and the first action are identical except that this action was filed by a subsequently designated Tax Matters Partner should the Court determine that Russian Advisors is not the proper TMP under the federal tax laws. Both cases involve the same parties and are based on the same or similar claims.

5. Assignment to a single judge, and consolidation of the three actions, is likely to conserve judicial resources and promote an efficient determination of the actions.

THEREFORE, Bracebridge respectfully requests that those three actions be consolidated and assigned to the same judge.

Respectfully submitted,

BRACEBRIDGE CAPITAL, L.L.C.,
Tax Matters Partner for RUSSIAN
RECOVERY FUND LIMITED
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Dated: January 12, 2006